

### REMARKS

Claims 1 and 3-9 are pending.

Claim 1 has been amended by adding the features of original claim 2 (now canceled).

The dependency of other claims has been changed in view of the amendment to claim 1 and the cancellation of claim 2.

In the Office action, the claims were rejected as unpatentable over the combination of U.S. Patent Nos. 5,511,161 (Sato et al.) and 6,325,528 (Wittmeier et al.). As discussed below, applicant respectfully requests reconsideration.

The primary reference relied upon by the Examiner is the Sato et al. patent, which relates to a system that includes a main unit 3 and one or more sub-units 4, 5, 6 (FIG. 1). That patent discloses that, when runaway of the microcomputer in the sub-unit is detected, a power shut-off means in the main unit shuts off the power supply to the sub-unit. The microcomputer in the sub-unit is reset when the power supply is restarted.

The Wittmeier et al. patent relates to a vehicle headlight assembly that includes a motor 9 to regulate the aim of the light beam. The motor is controlled by a control unit 10, which is part of the headlight assembly (FIG. 1).

The Office action states that it would have been obvious to use the technique of the Sato et al. patent with the headlight assembly of the Wittmeier et al. patent. Applicant respectfully disagrees.

First, as noted above, the Sato et al. patent is directed to a system that includes a main control unit and at least one sub-unit with a microcomputer. The Wittmeier et al. patent is based on a control system that includes a single control unit 10. In the Wittmeier et al. patent, there is no separate control unit to control the control unit 10. Therefore, using the technique of the Sato et al. patent in the Wittmeier et al. patent would require the addition of another control unit,

resulting in a more complicated apparatus. There would have been no reason to add such a second control unit because it would result in higher cost and a more complicated apparatus.

Furthermore, claim 1, as amended, recites that the main control circuit causes the power supply control means to continue to maintain the power supply cut off state when the main control circuit repeatedly detects an abnormality in the sub-control circuit after the power supply control means has been activated. Thus, if the abnormality is detected repeatedly, power is cut-off from the sub-control circuit and is not reset as it would otherwise be (*i.e.*, the cut off state is “maintained”).

In contrast, according to the Sato et al. patent, each time the main unit detects a runaway condition of a subunit, power to the subunit is shut off “so that the resetting means in the subunit resets the microcomputer” in the subunit (col. 2, lines 9-12; *see also* col. 3, lines 45-64). The system of the Sato et al. patent appears capable of repeatedly detecting a runaway condition, shutting off power to the subunit, and then resetting the subunit’s microcomputer. However, each time the microcomputer is reset, the power supply to the subunit is turned on (*see* FIG. 4). Therefore, even when a runaway condition repeatedly is detected, the power cut off state is not “maintained.” Instead, the operation illustrated by FIG. 4 will occur so that the subunit’s microcomputer is reset.

At least for the foregoing reasons, the pending claims should be allowed.

It is believed that all of the pending claims have been addressed. However, the absence of a reply to a specific rejection, issue or comment does not signify agreement with or concession of that rejection, issue or comment. In addition, because the arguments made above may not be exhaustive, there may be reasons for patentability of any or all pending claims (or other claims) that have not been expressed. Finally, nothing in this paper should be construed as an intent to concede any issue with regard to any claim, except as specifically stated in this

Applicant : Toshihisa Hayami  
Serial No. : 10/697,524  
Filed : October 30, 2003  
Page : 6 of 6

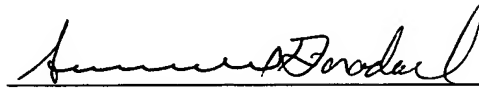
Attorney's Docket No.: 10973-109001 / K43-  
160302M/KIK

paper, and the amendment of any claim does not necessarily signify concession of unpatentability of the claim prior to its amendment.

Please apply any other charges or credits to deposit account 06-1050.

Respectfully submitted,

Date: 6/9/05

  
\_\_\_\_\_  
Samuel Borodach  
Reg. No. 38,388

Fish & Richardson P.C.  
Citigroup Center  
52nd Floor  
153 East 53rd Street  
New York, New York 10022-4611  
Telephone: (212) 765-5070  
Facsimile: (212) 258-2291